

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Case No.: 1:18-cv-07177

Yu Peng Lu, individually and on
behalf of all other employees similarly situated,

Plaintiffs,

ATTORNEY DECLARATION

-against-

NISEN SUSHI OF COMMACK, LLC d/b/a
Nisen Sushi, TOM LAM, and ROBERT BEER,

Defendants.

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I, CHRISTOPHER J. CASSAR, an attorney duly licensed to practice law in the Eastern District of New York, hereby declares as follows under the penalties of perjury, pursuant to 28 U.S.C. 1746:

1. I am an attorney with THE CASSAR LAW FIRM, P.C., attorney for the Defendants, NISEN SUSHI OF COMMACK, LLC d/b/a Nisen Sushi, and TOM LAM in the above captioned matter.
2. I am fully familiar with the facts described herein by virtue of my representation of the Defendants in this case, conversations with Defendant, TOM LAM, a review of the Court's Docket History, the pleadings, and other materials in this matter.
3. A default was granted by the Clerk of the Court against the Defendants on April 6, 2020 in the amount of \$248,536.47.
4. The Defendants now move to set aside the default for good cause and vacate the default judgment.

WHEREFORE, it is respectfully requested that this Honorable Court grant the Defendants motion in all respects, and for such other and further relief as is just and proper.

Dated: Huntington, New York
December 2, 2020

By:

Yours, etc.,
THE CASSAR LAW FIRM, P.C.
/s/
Christopher J. Cassar, Esq. (CC9520)
Attorneys for the Defendants
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